

Federal Defenders OF NEW YORK, INC.

Southern District
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August 14, 2020

BY ECF & EMAIL

The Honorable Sarah L. Cave
United States Magistrate Judge
500 Pearl Street
New York, New York 10007

**Re: United States v. Isaac Abergel
20 Mj. 2386 (UA)**

Dear Judge Cave:

I write with the consent of Assistant United States Attorney Samuel Adelsberg to respectfully request that Mr. Abergel's travel restrictions be expanded to include the District of New Jersey. Pretrial Services officer Francesca Tessier-Miller has no objection to this request.

On April 2, 2020 Your Honor imposed the following bail conditions: \$50,000 PRB cosigned by two financially responsible persons whom will act as third-party custodians and be responsible to the Court for ensuring Mr. Abergel's compliance with all conditions of release; Travel restricted to SDNY/EDNY; Mr. Abergel must reside with his mother in Brooklyn, NY; Surrender travel documents and no new applications; Pretrial supervision as directed by Pretrial Services; Drug testing/treatment as directed; Mental health treatment; Deft not to possess a firearm/Destructive Device/Other Weapon. Mr. Abergel must refrain from alleged conduct; Refrain from social media use and internet connected devices only to be used to communicate with Pretrial Services, defense counsel, family members, religious advisers, and health care professionals. Mr. Abergel has been compliant with all of these conditions since his release in April.

Mr. Abergel now requests permission to expand his travel restrictions to the District of New Jersey. He has multiple family members who reside in New Jersey including his cousin who is getting married on August 25, 2020. The ceremony will be held at the Ohel Yaacob Congregation located at 4 Ocean Ave, Deal, NJ 07723. Mr. Abergel and his cousin grew up together and share a close relationship. If granted permission Mr. Abergel would drive with his

mother, with whom he resides to attend the wedding together and visit family. Mr. Abergel has been on bail for over four months without issue.

Thank you for consideration of this request.

Respectfully Submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
(212) 417-8735/(917) 612-2753

SO ORDERED:

Granted.
Mr. Abergel must check in with
Pretrial Services within 24 hours
of his return from the August 25
wedding.

 8/14/2020

HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE

cc: AUSA Sam Adelsberg (by email)
PTSO Francesca Tessier-Miller (by email)